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November 29, 2007

Via Electronic and Regular Mail

Thomas C. Williams, LPG
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

RE: 2010300074 – Winnebago County
Southeast Rockford Groundwater Contamination Site
Superfund/Technical Reports
CERCLIS ID No. ILD981000417
SECOR Project No.: 13UN.02072.08

Dear Mr. Williams:

On behalf of Hamilton Sundstrand Corporation (HSC), SECOR International Incorporated (SECOR) has prepared this correspondence to propose inclusion of certain Resource Conservation and Recovery Act (RCRA) Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) at the HSC Plant 1 / Former Plant 2 Facilities in Rockford, Illinois ("the facility"), into the CERCLA Remedial Action. The facility is located within Area 9/10 of the Southeast Rockford Groundwater Contamination Superfund Site. This submittal is made in response to the request of USEPA in the October 25, 2007 meeting between USEPA, Illinois EPA, USDOJ and HSC.

The attached table (Table 1) includes a list of the twenty SWMUs and AOCs documented at the facility in the July 1992 RCRA Facility Assessment (RFA) and the November 1992 *Closure Plan, Plant 1 Container Storage Area* (approved by Illinois EPA in February 1993).

Twelve SWMUs/AOCs (highlighted in color on the table) are proposed for inclusion in the Remedial Action Consent Decree/Statement of Work (CD/SOW) presently being negotiated. These SWMUs/AOCs were identified based on the fact that subsurface investigation may be required at these locations based on their historic use and current physical conditions. In view of the focus of this Consent Decree on source removal, including these units within the Remedial Action work will enhance the overall efficiency of completing the work consistent with USEPA and Illinois EPA programmatic considerations, while at the same time addressing HSC objectives.

It is anticipated that the eight remaining SWMUs/AOCs may be closed more efficiently by visual inspection followed by documentation of their conditions (using the form developed by SECOR and previously approved by Illinois EPA) in a request for closure. If such closure approval cannot be granted for certain SWMUs/AOCs, HSC may request that they be incorporated for remaining closure activities into the Remedial Action at a later date.

Please contact me with any questions you may have on the information presented.

Sincerely,
SECOR International Incorporated

Keith T. Wilcoxson, PG, CHMM
Senior Geologist

cc: Shari Kolak, USEPA
Scott Moyer, United Technologies Corporation
Victoria Haines, Hamilton Sundstrand
Earl Phillips, Robinson & Cole
Richard Fil, Robinson & Cole

Table 1
RCRA SWMUs/AOCs
Hamilton Sundstrand Plant 1 / Former Plant 2 Facilities
Rockford, Illinois
CERCLIS ID #981000417

SWMU or AOC # (with associated Document)	SWMU Name/Description
SWMU 1 (RFA)	Wastewater Treatment Plant (WWTP)
SWMU 2 (RFA)	Scrubber (Roof)
SWMU 3 (RFA)	Tank Farm (North)
SWMU 4 (RFA)	Tank Farm (South)
SWMU 5 (RFA)	Underground Tank #1
SWMU 6 (RFA)	Underground Tank #2
SWMU 7 (RFA)	Underground Tank E
SWMU 8 (RFA)	Underground Tank #32
SWMU 9 (RFA)	Plant #2 Drum Storage Area (OSA)
SWMU 10 (RFA)	Plant #1 Indoor Drum Storage Area
SWMU 11 (RFA)	Impacted Soil Drum Storage Area
SWMU 12 (RFA)	Aboveground Indoor Storage Tank
SWMU 13 (RFA)	Onsite Area 9/10 Conditions
SWMU 14 (RFA)	Waste Oil Drum
AOC 25 (CP)	Drum Wash Area
AOC 26 (CP)	Old Dichromate Line
AOC 27 (CP)	Plant 1 Old Plating Area
AOC 28 (CP)	Plant 1 Sodium Dichromate Line
AOC (no #, CP)	Acid Drum Storage Area
AOC (no #)	2000 LUST Incident

Notes:

SWMU = Solid Waste Management Unit

AOC = Area of Concern

RFA = RCRA Facility Assessment - 7-27-92

CP = Closure Plan, Plant 1 Container Storage Area - 11-19-92

OSA = Outside Container Storage Area

Blue highlight = SWMUs/AOCs proposed for inclusion in the SE Rockford Groundwater Contamination Superfund Site Remedial Action Consent Decree/Statement of Work (CD/SOW) based on their historic use and current physical conditions

Other SWMUs/AOCs to be visually inspected; their conditions will be documented using the Illinois EPA approved form in a request for closure; if closure cannot be granted for certain SWMUs/AOCs, it may be requested they be incorporated for remaining closure activities into the Remedial Action at a later date.